

**STATE OF ILLINOIS  
SECRETARY OF STATE  
SECURITIES DEPARTMENT**

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**IN THE MATTER OF: GORDON J VANDEVELD,  
and FxTRADE FINANCIAL, LLC,  
his/its partners, officers and directors, agents,  
employees, affiliates, successors and assigns.**  
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**FILE NO. 0400214**

**TEMPORARY ORDER OF PROHIBITION**

**TO RESPONDENTS:**      Gordon J. Vandeveld  
                                 2530 Iroquois Road  
                                 Wilmette, Illinois 60091  
  
                                 FxTrade Financial, LLC  
                                 318 Ridge Lake Boulevard  
                                 Suite 300  
                                 Memphis, Tennessee 38125

On information and belief, I, Jesse White, Secretary of State for the State of Illinois, through my designated representative, who has been fully advised in the premises by the staff of the Securities Department, Office of the Secretary of State, herein find:

1.     That respondent FxTrade Financial, LLC ("FxTrade" or collectively with Vandeveld, "Respondents") is or was, at all times referred to herein, a Tennessee company with its address at 318 Ridge Lake Boulevard, Suite 300, Memphis, Tennessee 38125.
2.     That respondent Gordon J. Vandeveld ("Vandeveld" or collectively with FxTrade, "Respondents") is or was an agent of Respondent FxTrade. He resides at 2530 Iroquois Road, Wilmette, Illinois 60091. His business address is 1765 Maple Street, Suite 10, Northfield, Illinois 60093.
3.     That between November 2003 and April 2004, FxTrade, by and through its agent Respondent Vandeveld, solicited at least one Illinois resident to invest in "FxTrade Individual Retirement Account" which purported to pay a "guaranteed monthly return of 2%-3% (minimum investment: \$100,000).

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4. That during and subsequent to that solicitation Respondent Vandeveld caused to be delivered to at least one Illinois resident ("Offeree") an offering circular, sales literature, and a contract to be signed by the Offeree and sent, with at least \$100,000, to Respondent FxTrade.
5. That the activities set forth in paragraphs 3 and 4 above constitute the offer of an investment contract, and therefore a security, as those terms are defined in Sections 2.1, 2.5, and 2.5a of the Illinois Securities Law of 1953 [815 ILCS 5], (the "Act").
6. That Section 5 of the Act provides, inter alia, that all securities except those exempt under Section 3, or those offered and sold in transactions exempt under Section 4, shall be registered either by coordination or by qualification prior to their offer or sale in the State of Illinois.
7. That Respondents failed to file with the Secretary of State an application for registration of the securities described above as required by the Act, and that as a result the security was not registered pursuant to Section 5 of the Act prior to being offered for sale in the State of Illinois.
8. That Section 12.A of the Act provides, inter alia, that it shall be a violation for any person to offer or sell any security except in accordance with the provisions of the Act.
9. That Section 12.D of the Act provides, inter alia, that it shall be a violation for any person to fail to file with the Secretary of State any application, report or document required to be filed under the provisions of the Act or any rule or regulation made by the Secretary of State pursuant to the Act.
10. That by virtue of the foregoing, Respondent FxTrade has violated Sections 12.A and 12.D of the Act.
11. That by virtue of the foregoing, Respondent Vandeveld has violated Sections 12.A and 12.D of the Act.
12. That the aforementioned findings are based on credible evidence.
13. That Section 11.F (2) of the Act provides, inter alia, that the Secretary of State may temporarily prohibit the offer or sale of securities by any person, without notice and prior hearing, if the Secretary of State shall deem it necessary to prevent an imminent violation of the Act or to prevent losses to investors that will occur as a result of prior violations of the Act.
14. That the entry of this Temporary Order **PROHIBITING** Respondents, or their agents, affiliates, successors and employees, from offering or selling securities in the State of Illinois is in the public interest and for the protection of the investing public and is consistent with the purposes intended by the provisions of the Act.

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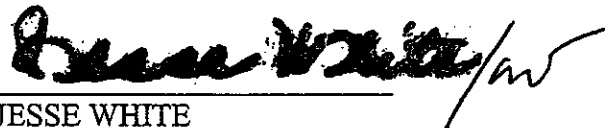
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NOW THEREFORE IT IS HEREBY ORDERED THAT: pursuant to the authority granted by Section 11.F of the Act, FxTrade Financial, LLC, its officers and directors, agents, employees, affiliates, successors and assigns; and Gordon J. Vandeveld, are **PROHIBITED** from offering or selling securities in or from this State until the further Order of the Secretary of State.

NOTICE is hereby given that Respondents may request a hearing on this matter by transmitting such request in writing to the Director, Illinois Securities Department, 17 North State Street, Suite 1266, Chicago, Illinois 60602. Such request must be made within thirty (30) calendar days of the date of entry of the Temporary Order of Prohibition. Upon receipt of a request for hearing, a hearing will be scheduled as soon as reasonably practicable. A request for hearing will not stop the effectiveness of this Temporary Order and will extend the effectiveness of this Temporary Order for sixty days from the date the hearing request is received by the Department.

FAILURE BY ANY RESPONDENT TO REQUEST A HEARING WITHIN THIRTY (30) CALENDAR DAYS AFTER ENTRY OF THIS TEMPORARY ORDER OF PROHIBITION SHALL CONSTITUTE AN ADMISSION OF ANY FACTS ALLEGED HEREIN AND SHALL CONSTITUTE SUFFICIENT BASIS TO MAKE THIS TEMPORARY ORDER OF PROHIBITION FINAL.

Dated: This 26<sup>th</sup> day of May 2004.

A handwritten signature in black ink, appearing to read "Jesse White", with a stylized flourish extending to the right.

JESSE WHITE  
Secretary of State  
State of Illinois

Attorney for the Secretary of State:

James J. Tierney  
Illinois Securities Department  
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Chicago, Illinois 60602  
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